

**From:** "Ron Montgomery" <rmontgomery@rockdalefcu.org> on 10/11/2007 11:20:01 AM

**Subject:** Truth in Lending

The Board of Governors of the Federal Reserve System

Docket Nol R-1286

Honorable Board of Governors,

Concerning proposed changes to REG. Z and multi-featured open-end lending rules, Rockdale Federal Credit Union views the changes as an extreme encumbrance for credit unions using open-end lending, particularly with reference to the convenience of members' auto loans.

With the current system having worked well for over 25 years, many credit union members rely on their credit union for their lending needs and the convenience the system provides. At Rockdale Federal Credit Union in Rockdale, Texas, we are considering a change from closed-end lending to the current open-end lending format which will be more favorable to our members who rely on us for their financial needs and excellent vehicle interest rates.

From our research and industry inputs, members/consumers receive adequate disclosures with few complaints concerning such from memberships. In examining an open-end approach to lending, the current system is favorable to members who rely on their financial cooperative while the proposed changes to the system would be an extreme encumbrance to the membership and the credit union trying to deliver competitively priced products.

From all information provided to date, Rockdale Federal Credit Union does not see the viability of the changes. A solution to a problem that does not exist appears to be unnecessary.

Thank you for your consideration to all credit union members and their respective credit unions.

Respectfully and sincerely yours,

Ronald W. Montgomery, President